

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ALLAN SCOTT, DERIVATIVELY AND	)	Case No. 1:15-cv-09691-RWS
ON BEHALF OF 6D GLOBAL	)	
TECHNOLOGIES INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
BENJAMIN TIANBING WEI A/K/A/	)	
BENJAMIN WEY, NEW YORK GLOBAL	)	
GROUP, INC., NYGG (ASIA), LTD.,	)	
TEJUNE KANG, MARK SZYNKOWSKI,	)	
ADAM HARTUNG, DAVID S.	)	
KAUFMAN, TERRY MCEWEN,	)	
ANUBHAV SAXENA, PIOTR A.	)	
CHRSZASZCZ, and MICHAEL BANNOUT,	)	
	)	
Defendants,	)	
	)	
And	)	
	)	
6D GLOBAL TECHNOLOGIES INC.,	)	
	)	
Nominal Defendant.	)	
	)	
	)	
	)	
	)	

**DECLARATION OF TIMOTHY W. BROWN IN SUPPORT OF MOTION FOR  
LEAVE TO FILE SECOND AMENDED COMPLAINT**

I, Timothy W. Brown, declare as follows:

1. I am the managing attorney of The Brown Law Firm, P.C., counsel for Plaintiff Allan Scott in the above-captioned action (the “Action”).

2. I submit this declaration in support of Plaintiff's Motion for Leave to File Second Amended Complaint (the "Motion").

3. I have personal knowledge of the facts stated below. I could and would competently testify to these facts, if called upon to do so.

4. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff's [Proposed] Second Amended Verified Shareholder Derivative Complaint.

5. Attached hereto as Exhibit 2 is a true and correct copy of a redline between Plaintiff's [Proposed] Second Amended Verified Shareholder Derivative Complaint and Plaintiff's previously filed Amended Verified Shareholder Derivative Complaint.

6. Attached hereto as Exhibit 3 is a true and correct copy of an email thread between myself and counsel for defendants 6D Global Technologies, Inc., Tejune Kang, Mark Szyrkowsky, Terry McEwen, Piotr A. Chrzaszcz, and Michael Bannout, stating that these defendants will not oppose the Motion.

7. I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct.

Executed this 9th day of July 2018, at Oyster Bay, New York.

s/ Timothy W. Brown  
Timothy W. Brown